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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of

Co-channel Protection
Criteria for Part 90,
Subpart S Stations
Operating above 800MHz

PR Docket No. 93-60
RM-8028

To: The Commission

COMMENTS OF FEDERAL EXPRESS CORPORATION

PR Docket 93-60 raises several issues of technical
importance which seek to level the playing field among the
various types of radio users: trunked conventional SMP

The Commission's short-space table is acceptable

Generally, Federal Express supports the proposed short space table and finds that its use, in lieu of the less conservative 40/30 ratio, results in short spaced systems far less prone to harmful interference.

Federal Express wishes to qualify its support for the table. Federal Express has consistently maintained that the R-6602 curves are inappropriate because they do not take local terrain factors into consideration. We find that balancing the

SMR and non-SMR, regardless of Radio Service Category or eligibility) whenever co-channel separations of less than 70 miles are sought. (In those geographic areas where the Rules mandate greater separations [Northern and Southern California, and Washington State], the greater separation criteria should continue to be met.)

Federal Express disagrees with the Commission's assertion that employment of a more conservative 40/22 contour may result in a decrease in frequency reuse. On the contrary, utilization of 40/30 as the protection standard too often results in increased inter-station interference. The existing user's need for reliable communications remains constant, but the quality of his system is diminished by the introduction of a 40/30-based short spaced station. To restore reliable communications, the original licensee could be obliged to add additional stations, even additional frequencies. The result is clearly less, not more, effective spectrum utilization.

It is important to note that the SMR industry's interest in short-spaced stations is driven primarily by capacity, rather than coverage reasons. Not all radio users share this focus. For the non-SMR operator, coverage is the primary technical goal and an interference-free environment is the primary operational goal.

A short spaced station not meeting the table may request a waiver

Applicants should be required to comply with the station separations as specified in the proposed table. This is a serviceable table, and should be used for all types of stations:

trunked and non-trunked, SMR and non-SMR, for coordinated and non-coordinated frequencies. Administrative ease of the Coordinator and the Commission would also be greatly enhanced.

Exceptions to the table would be by consensus, or via waiver supported by engineering which is based on a 40/22 contour that takes terrain into consideration. No waiver of 90.621(b)(4) should be considered routine. Any such waiver considered by the Commission should be unique in nature and requested only in those cases where the presence of extenuating terrain features could be readily established. **The R-6602 curves do not take into account the specifics of the land mobile environment and cannot be used as a propagation model in the waiver process.**

Federal Express feels that it would save Commission time when reviewing these waivers, if the applicant were required to first seek consent from the existing licensee. By requiring this step, the existing licensee would be informed of the proposed change in his own operating environment in a timely manner. The two parties would likely work out a compromise and avoid the necessity to process a waiver at all.

All waiver requests should include verification of attempted consensus. The existing licensee should be provided with notification of the waiver submission along with a copy of the requisite terrain-based propagation analysis.

It would be unfair to require the applicant to wait for return correspondence before filing his waiver request, but proof of a good-faith attempt to secure consent to short space should be a required element in the waiver request package. Should a

reply be proffered by the existing licensee, it can be attached to the pending application by amendment. In those cases where the reply is affirmative, the application could be amended to supplant the waiver request with a consent letter, thereby removing the application from the Tech Section's work load.

Likewise, if a negative reply contains engineering analysis disputing the applicant's non-interference claim, that, too, would become part of the record.

Use the same criteria for all types of stations

There are no technical reasons for employing different

Federal Express strongly urges the Commission to utilize the same ERP/AAT ratios for all types of systems: trunked and conventional, SMR and non-SMR. This would hold true in the areas where greater separation requirements prevail, such as Northern and Southern California and Washington State. Federal Express agrees with the wording of proposed Rule Section 90.621 (b) and adds that 90.621 (b) (1), (2) and (3) (addressing conditions in Southern California, Northern California and Washington States, respectfully) be reworded to remove system differentiation terminology, as follows:

90.621(b)(1): Except as indicated in paragraph (b)(4) of this section, no system will be less than 169 km. (105 mi) distant from co-channel systems authorized 1 kw ERP on any of the following mountain top sites: Santiago Peak, Sierra Peak, Mount Lukens, Mount Wilson (California).

90.621(b)(2): The separation between certain co-channel systems located at high antenna sites in the State of California north of ...

90.621(b)(3): Except as indicated in




Conclusion

In conclusion, Federal Express applauds the Commission's attempt to introduce logical and fair interference protection criteria into the varied operating and technical environments required by a variety of Part 90 eligibles. Utilizing a single set of criteria, the proposed short space table, prescribing parity in operational parameters such as ERP between types of stations, and requiring applicants who do not meet the table to attempt to obtain consent as part of the waiver request process, will contribute substantially to intelligent engineering of systems and to the Commission's ability to efficiently administer the co-channel separation Rules.

Respectfully submitted,

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